

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	:	
		:	
UNITED STATES OF AMERICA		:	
		:	CONSENT PRELIMINARY ORDER
- v. -		:	OF FORFEITURE/
		:	<u>MONEY JUDGMENT</u>
BRUCE BAGLEY,		:	
		:	19 Cr. 765 (JSR)
Defendant.		:	
- - - - -	x		

WHEREAS, on or about October 24, 2019, BRUCE BAGLEY (the "defendant"), was charged in a three-count Sealed Indictment, 19 Cr. 765 (JSR) (the "Indictment"), with conspiracy to commit money laundering, in violation of, Title 18, United States Code, Section 1956(h) (Count One) and money laundering, in violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2 (Counts Two and Three);

WHEREAS, the Indictment included a forfeiture allegation as to Counts Two and Three of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), a sum of money equal to \$474,000 in United States currency, representing property involved in the offenses charged in Counts Two and Three of the Indictment;

WHEREAS, on or about June 1, 2020, the defendant pled guilty to Counts Two and Three of the Indictment, pursuant to a plea agreement with the Government, wherein the defendant admitted the forfeiture allegation with respect to Counts Two and Three of the Indictment and agreed to forfeit to the United States, pursuant

to Title 18, United States Code, Section 982(a)(1), a sum of money equal to \$474,000 in United States currency, representing property involved in the offenses charged in Counts Two and Three of the Indictment;

WHEREAS, the defendant consents to the entry of a money judgment in the amount of \$474,000 in United States currency, representing the amount of property involved in the offenses charged in Counts Two and Three of the Indictment;

WHEREAS, the defendant agrees to make a payment of \$232,000 to the United States (the "Payment") on or before the date of sentencing;

WHEREAS, the Government agrees to accept the Payment in full satisfaction of the Money Judgment provided the Payment is made on or before the date of sentencing; and

WHEREAS, the defendant admits that, as a result of acts and/or omissions of the defendant, the property involved in the offenses charged in Counts Two and Three of the Indictment cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Geoffrey S. Berman, United States Attorney, Assistant United States Attorney, THANE REHN, of counsel, and the defendant, and his counsel, PETER QUIJANO, Esq. and ANNA SEDARIS, Esq. that:

1. As a result of the offenses charged in Counts Two and Three of the Indictment, to which the defendant pled guilty,

a money judgment in the amount of \$474,000 in United States currency (the "Money Judgment"), representing the amount of property involved in the offenses charged in Counts Two and Three of the Indictment, shall be entered against the defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the defendant, BRUCE BAGLEY, and shall be deemed part of the sentence of the defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the defendant's name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment in the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. The Government agrees to accept the Payment in full satisfaction of the Money Judgment provided the Payment is made on or before the date of sentencing.

6. If for any reason the Payment is not made on or before the date of sentencing, then pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the defendant up to the uncollected amount of the Money Judgment.

7. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

8. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

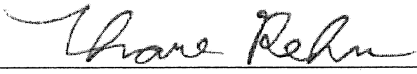
9. The Clerk of the Court shall forward three certified copies of this Consent Preliminary Order of Forfeiture/Money Judgment to Assistant United States Attorney Alexander J. Wilson, Co-Chief of the Money Laundering and Transnational Criminal Enterprises Unit, United States Attorney's Office, One St. Andrew's Plaza, New York, New York 10007.

(REMAINDER OF PAGE INTENTIONALLY LEFT BLANK)

10. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

By:  06/01/2020  
THANE REHN DATE  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2354

BRUCE BAGLEY

By: \_\_\_\_\_  
BRUCE BAGLEY DATE

By: \_\_\_\_\_  
PETER QUIJANO, ESQ. DATE  
ANNA SEDARIS, ESQ.  
Attorneys for Defendant  
40 Fulton Street, Floor 23  
New York, NY 10038

SO ORDERED:

\_\_\_\_\_  
HONORABLE JED S. RAKOFF DATE  
UNITED STATES DISTRICT JUDGE

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GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

By:

THANE REHN  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2354

DATE

BRUCE BAGLEY

By:

BRUCE BAGLEY

DATE

By:

PETER QUIJANO, ESQ.  
ANNA SEDARIS, ESQ.  
Attorneys for Defendant  
40 Fulton Street, Floor 23  
New York, NY 10038

DATE

SO ORDERED:

HONORABLE JED S. RAKOFF  
UNITED STATES DISTRICT JUDGE

DATE

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AGREED AND CONSENTED TO:

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York


By: THANE REHN  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2354

DATE

BRUCE BAGLEY

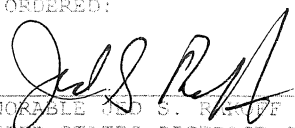
By: BRUCE BAGLEY

DATE

By:   
PETER QUIJANO, ESQ.  
ANNA SEDARIS, ESQ.  
Attorneys for Defendant  
40 Fulton Street, Floor 23  
New York, NY 10038

6/1/20  
DATE

SO ORDERED:

  
HONORABLE JUD S. RUFF  
UNITED STATES DISTRICT JUDGE

6/1/20  
DATE